

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT BECKLEY**

**MATTHEW GIBSON,**

**Plaintiff,**

**v.**

**CIVIL ACTION NO.: 5:21-cv-00181  
HONORABLE FRANK W. VOLK**

**LOUISE E. GOLDSTON, individually,  
COUNTY COMMISSION OF RALEIGH  
COUNTY, a political subdivision,  
JEFF MCPEAKE, individually,  
BRIAN WHITE, individually,  
BOBBY STUMP, individually,  
KYLE LUSK, individually,**

**Defendants.**

**DEFENDANTS RALEIGH COUNTY COMMISSION, JEFF MCPEAKE, BRIAN  
WHITE AND BOBBY STUMP'S VERDICT FORM**

1. Do you find that the Plaintiff has proven, by a preponderance of the evidence, that Defendants Jeff McPeake and Bobby Stump subject Plaintiff Matthew Gibson to an unreasonable search and seizure in violation of the Fourth Amendment?

\_\_\_\_\_  
Yes

\_\_\_\_\_  
No

2. Do you find that the Plaintiff has proven, by a preponderance of the evidence, that Defendant, Jeff McPeake violated Plaintiff Matthew Gibson's First Amendment rights?

\_\_\_\_\_  
Yes

\_\_\_\_\_  
No



3. Do you find that the Plaintiff has proven, by a preponderance of the evidence, that Defendant Raleigh County Commission had a policy or custom that was the moving force leading to a violation of Plaintiff Matthew Gibson's constitutional rights?

\_\_\_\_\_  
Yes

\_\_\_\_\_  
No

4. If you find that the Plaintiff is entitled to damages in this case, please specify the amounts, if any, of the following damages:

**Compensatory Damages:**

Medical expenses \_\_\_\_\_

**Total:** \_\_\_\_\_

**General Damages:**

Sorrow, mental anguish and solace \_\_\_\_\_

**Total:** \_\_\_\_\_

5. Do you find that the Plaintiff has proven, by a preponderance of the evidence, that he is entitled to collect punitive damages from Defendants McPeake and Stump?

\_\_\_\_\_  
Yes

\_\_\_\_\_  
No

If your answer to Question 5 is "Yes," please list an amount of punitive damages in response to Question 6. If your answer to Question 5 is "No," then skip question 6, sign the verdict form and inform the bailiff that you have completed your deliberations.



6. If your answer to Question 5 is “Yes,” specify an amount of punitive damages below:

Punitive Damages

\_\_\_\_\_

\_\_\_\_\_  
**DATE**

\_\_\_\_\_  
**JURY FOREPERSON**